

Zach Nichols

May 6, 2021

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

FLAME SPRAY NORTH AMERICA, )  
INC., )  
 )  
Plaintiff, )  
 ) Case No. 6:18-CV-02845-BHHH  
vs. )  
 )  
KERR PUMPS, INC., )  
 )  
 )  
Defendant. )

VIDEO DEPOSITION OF ZACH NICHOLS  
TAKEN ON BEHALF OF THE DEFENDANT  
IN SEILING, OKLAHOMA  
ON MAY 6, 2021  
9:25 AM - 11:14 AM (CDT)

REPORTED BY: JOHN Q. MARTIN, II, CSR #1940

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1 and other things?

2 MR. SPEED: Object to form.

3 THE WITNESS: Correct.

4 BY MS. WRENN:

5 Q. Did you say yes?

6 A. Correct.

7 Q. Okay. And I had seen that Gore is purchasing  
8 all the plungers from third parties, it doesn't  
9 manufacture or coat any plungers in-house, is that  
10 fair?

11 A. No, ma'am.

12 Q. Okay.

13 A. I have looked at resurfacing plungers and  
14 everybody I talked to says you're better off to buy a  
15 new one. So, we just buy new ones.

16 Q. With regard to the fracking plungers, who was  
17 your contact person at Kerr?

18 A. Bobby Shelton.

19 Q. Has Gore ever done any business with Kerr's  
20 sister company, FlowValve?

21 A. Yes.

22 Q. What have you bought from FlowValve?

23 A. Frac iron.

24 Q. Have you ever bought any clappers or  
25 flappers?

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1 A. For check valves?

2 Q. I really don't know what they are used for.

3 I just know the manufacturer of them.

4 A. Yeah, I'm sure we have.

5 Q. Okay. Did you ever have any coating

6 delamination issues with those?

7 A. Not that I know of.

8 Q. Okay. And is that something you would be

9 aware of if it happened?

10 A. If a clapper wears out it's because of sand.

11 So, I could imagine if there was going to be any

12 delamination there would darn sure be some

13 delamination because sand and water is pumped through

14 it at a high rate of speed and a high rate of

15 pressure.

16 Q. Are you saying you would expect coating

17 delamination on the clappers?

18 A. Yeah.

19 Q. So, that would not be abnormal?

20 A. No. If the clapper you're mentioning is the

21 clapper I'm thinking of, yeah, you're going to have --

22 that's going to wear out every -- that's constant

23 wear.

24 Q. Based on the invoices that Gore produced from

25 Kerr it looks like you guys would purchase a variety